

REMARKS

In the Office Action, the Examiner noted that claims 13-24 are pending in the application, that claims 13, 14, 16, 17, 20, 21 and 23 stand rejected, and that claims 15, 18, 19, 22 and 24 are objected to but would be allowable if rewritten in independent form and including all of the limitations of the base claim and any intervening claims. By this response, claims 13 and 20 have been amended to include the limitations of claims 18 and 22, respectively, which the Examiner indicated contain allowable subject matter.

The Applicant gratefully acknowledges the Examiner's indication of allowable subject matter and has made the amendments suggested by the Examiner. As such, the Applicant respectfully submits that none of these claims now pending in the application are rendered obvious under the provisions of 35 U.S.C. § 103. Thus, the Applicant respectfully submits that all of these claims are now in allowable form.

Objection

The Examiner has objected to the Applicant's Specification indicating that Page 2, lines 11-28 of the specification is redundant because it repeats the discussion in the paragraph before.

The Applicant would like to respectfully point out to the Examiner that Page 2, lines 11-28 of the specification does not repeat the discussion in the paragraph before. More specifically, page 2, lines 11-28 of the specification teaches the quantization noise after gammatization of a video signal and the paragraph before teaches that PWM is responsible for overall noise level, especially in darker regions of a picture. That is, in page 2, lines 11-28 of the Applicant's Specification, the Applicant teaches that the big quantization steps, especially in the darker regions of the picture, increase strongly the noise level in those areas, and the paragraph before teaches that PWM is responsible for overall noise level in the darker regions of a picture.

The Applicant further submits that, even if Page 2, lines 11-28 of the Applicant's specification repeats the discussion in the paragraph before, the Examiner has no legal basis for making such an objection as the Applicant is unaware of any legal principle that restricts the repeating of information in a Specification.

For at least the reasons recited above, the Applicant respectfully requests that the Examiner's objection to the Applicant's Specification be withdrawn.

Rejections

A. 35 U.S.C. § 103

The Examiner rejected the Applicant's claims 13-14, 16-17, 20-21 and 23 under 35 U.S.C. § 103(a) as being unpatentable over Lillevold (US Pat. No. 7,054,500). The rejection is respectfully traversed.

The Applicant submits that Lillevold fails to teach or suggest each and every element of the Applicant's claimed invention as claimed in at least the Applicant's amended claim 13.

That is, as conceded by the Examiner, the Applicant submits that Lillevold absolutely fails to teach or suggest a method for reducing quantization error during video level signal processing for a display device with digitally driven pixels, including digitally filtering a signal charged with the quantization error with a digital filter having a plurality of filter coefficients, the signal including a video level for each pixel of the display device, and varying at least one of the filter coefficients of the filter in dependence on the video level for a current pixel by stronger filtering a lower video level for the pixel while less filtering or not filtering a higher video level for the pixel to reduce quantization error in the lower video level, wherein the filtering includes one and/or two dimensional median filtering as claimed by amended, independent claims 13 and 20. (emphasis added).

Therefore and for at least the reasons recited above, the Applicant submits that Lillevold fails to teach or suggest each and every element of the Applicant's claimed invention as claimed in at least the Applicant's amended, independent claims 13 and 20. As such, the Applicant submits that for at least the reasons recited above, the Applicant's independent claims 13 and 20 are not rendered obvious by the teachings of Lillevold, and, as such, fully satisfy the requirements of 35 U.S.C. § 103 and are patentable thereunder.

Furthermore, the Applicant's dependent claims 14, 16-18, 20-21 and 23-24 depend either directly or indirectly from the Applicant's independent claims 13 and 20, respectively, and recite additional features thereof. As such, the Applicant submits that at least because the Applicant's claims 13 and 20 are not rendered obvious by the teachings of Lillevold, the Applicant further submits that the Applicant's dependent claims 14, 16-18, 20-21 and 23-24, which depend either directly or indirectly from the

Applicant's claims 13 and 20, are also not rendered obvious by the teachings of Lillevold, and, as such, fully satisfy the requirements of 35 U.S.C. § 103 and are patentable thereunder.

The Applicant reserves the right to establish the patentability of each of the claims individually in subsequent prosecution.

Conclusion

Thus, the Applicant submits that none of the claims, presently in the application, are rendered obvious under the provisions of 35 U.S.C. § 103. Consequently, the Applicant believes that all these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

If however, the Examiner believes that there are any unresolved issues requiring adverse final action in any of the claims now pending in the application, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion, it is respectfully requested that the Examiner telephone the undersigned.

No fee is believed due. However, if a fee is due, please charge the additional fee to Deposit Account No. 07-0832.

Respectfully submitted,
Sebastian Weitbruch et al.

By: /Jorge Tony Villabon/
Jorge Tony Villabon
Attorney for Applicants
Reg. No. 52,322
(609) 734-6445

Patent Operations
Thomson Licensing Inc.
P.O. Box 5312
Princeton, New Jersey 08543-5312

February 9, 2010